UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA Richmond Division

GREGORY THOMAS BERRY, et al.

Plaintiffs,

Civil Action No. 3:11cv754

V.

LEXISNEXIS RISK & INFORMATION ANALYTICS GROUP, INC., et al.

Defendants.

PLAINTIFFS' CONSENT MOTION TO FILE AMENDED COMPLAINT

COME NOW the Plaintiffs, Gregory Thomas Berry, Summer Darbonne, Rickey Millen, Shamoon Saeed, Arthur B. Hernandez, Erika A. Godfrey and Timothy Otten ("Plaintiffs"), individually and on behalf of all others similarly situated and pursuant to Fed. R. Civ. P. 15, they move for leave to file their Amended Complaint (Exhibit "A"). Plaintiffs state that they have conferred with the opposing parties – Defendants – who have consented to the filing of the Amended Complaint.

Respectfully submitted, **PLAINTIFFS**

/s/

Leonard A. Bennett, VSB No. 37523 Susan M. Rotkis, VSB No. 40693 CONSUMER LITIGATION ASSOCIATES, P.C. 763 J. Clyde Morris Boulevard, Suite 1-A Newport News, Virginia 23601

Tel: (757) 930-3660 Fax: (757) 930-3662 lenbennett@clalegal.com srotkis@clalegal.com

Matthew J. Erausquin, VSB No. 65434 Janelle Mason Mikac, VSB No. 82389 CONSUMER LITIGATION ASSOCIATES, P.C. 1800 Diagonal Road, Suite 600 Alexandria, VA 22314

Tel: (703) 273-7770 Fax: (888) 892-3512 matt@clalegal.com janelle@clalegal.com

Michael A. Caddell CADDELL & CHAPMAN 1331 Lamar, Suite 1070 Houston, TX 77010

James A. Francis FRANCIS & MAILMAN Land Title Building, 19th Floor 100 South Broad Street Philadelphia, PA 19110

Dale W. Pittman, VSB No. 15673 THE LAW OFFICE OF DALE W. PITTMAN, P.C. The Eliza Spotswood House 112-A West Tabb Street Petersburg, VA 23803-3212 Tel: (804) 861-6000 Fax: (804) 861-3368 dale@pittmanlawoffice.com

Counsel for Plaintiffs Gregory Thomas Berry, Summer Darbonne, Rickey Millen, Shamoon Saeed, Arthur B. Hernandez, Erika A. Godfrey and Timothy Otten

CERTIFICATE OF SERVICE

I certify that on the 10th day of December, 2013, I electronically filed the foregoing Plaintiffs' Motion to Amend Complaint with the Clerk of Courts using the CM/ECF system, which will send notification of such filing to CM/ECF participants, and I hereby certify that I have mailed by United States Postal Service the document to the non-CM/ECF participants:

Leonard A. Bennett Susan M. Rotkis

Consumer Litigation Associates, P.C. 763 J. Clyde Morris Boulevard, Suite 1A Newport News, Virginia 23601

Telephone: 757-930-3660 Facsimile: 757-930-3662

Email: lenbennett@clalegal.com Emails: srotkis@clalegal.com

Counsel for Plaintiffs

Cynthia B. Chapman Craig C. Marchinado Caddell & Chapman 1331 Lamar St., Suite 1070 Houston, TX 77010 Telephone: 713-751-0400 Facsimile: 713-751-0906

Michael A. Caddell

Email: mac@caddellchapman.com Email: cbc@caddellchapman.com Email: ccm@caddellchapman.com

Counsel for Plaintiffs

James Arthur Francis
David A. Searles
Erin A. Novak
John Soumilas
Francis & Mailman PC
Land Title Building

100 S Broad Street 19th Floor

Philadelphia, PA 19110 Telephone: 215-735-8600 Facsimile: 215-940-8000

Email: jfrancis@consumerlawfirm.com Email: dsearles@consumerlawfirm.com Email: enovak@consumerlawfirm.com Email: jsoumilas@consumerlawfirm.com

Counsel for Plaintiffs

Dale Wood Pittman

The Law Office of Dale W. Pittman, P.C.

The Eliza Spotswood House

112-A W Tabb St.

Petersburg, VA 23803-3212 Telephone: 804-861-6000 Facsimile: 804-861-3368

Email: dale@pittmanlawoffice.com

Counsel for Plaintiffs

David Neal Anthony

TROUTMAN SANDERS LLP

Troutman Sanders Bldg

1001 Haxall Point

P.O. Box 1122

Richmond, VA 23219

(804) 697-5410

david.anthony@troutmansanders.com
Counsel for Defendant Reed Elsevier Inc.,
LexisNexis Risk Solutions FL Inc. and
LexisNexis Risk Data Management, Inc.

Janelle Mason Mikac

Consumer Litgation Associates PC (Alex)

1800 Diagonal Rd., Suite 600

Alexandria, VA 22314 Telephone: 703-273-7770

Facsimile: 888-892-3512

Email: janelle@clalegal.com

Counsel for Plaintiffs

Jeanne Giles

260 Gooseberry Drive Reno, NV 89523

Pro Se

Adam E. Schulman

Center for Class Action Fairness

1718 M. Street NW #236 Washington, DC 20036

Pro Se

David Brown

1717 Market Street

Tacoma, WA 98402

Pro Se

Ronald I. Raether, Jr. (*Pro Hac Vice*)

FARUKI IRELAND & COX. P.L.L.

500 Courthouse Plaza, S.W.

10 North Ludlow Street

Dayton, OH 45402

Telephone: 937.227.3733 Telecopier: 937.227.3717

Email: rraether@ficlaw.com

Counsel for Defendant Reed Elsevier Inc., LexisNexis Risk Solutions FL Inc. and LexisNexis Risk

Data Management, Inc.

James F. McCabe (*Pro Hac Vice*)

MORRISON & FOERSTER LLP

425 Market Street

San Francisco, CA 94105

Telephone: 415.268.7000

Facsimile: 415.268.7522

Email: jmccabe@mofo.com

Counsel for Defendant Reed Elsevier Inc., LexisNexis Risk Solutions FL Inc. and LexisNexis Risk

Data Management, Inc.

William Paul Ferranti (*Pro Hac Vice*) Winston & Strawn LLP (IL-NA)

35 W. Wacker Dr.

Chicago, IL 60601-9703

Attorneys for Megan Christina Aaron, et al.

Charles Bennett Molster, III Winston & Strawn LLP

1700 K St. NW

Washington, DC 20006

Kimball Richard Anderson (Pro Hac Vice)

Winston & Strawn LLP (IL-NA)

35 W. Wacker Dr.

Chicago, IL 60601-9703

Samuel Issacharoff (Pro Hac Vice)

New York, NY 10012

40 Washington Square South 411J William Paul Ferranti (*Pro Hac Vice*) Winston & Strawn LLP (IL-NA) 35 W. Wacker Dr. Chicago, IL 60601-9703 Counsel for Megan Christina Aaron, et al.

/s/Leonard A. Bennett

Leonard A. Bennett Virginia State Bar No. 37523 Counsel for Plaintiffs CONSUMER LITIGATION ASSOCIATES, P.C. 763 J. Clyde Morris Boulevard, Suite 1A Newport News, Virginia 23601

Telephone: 757-930-3660 Facsimile: 757-930-3662

Email: lenbennett@clalegal.com